

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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DEMETRIC DIAZ, OWEN DIAZ, and )  
LAMAR PATTERSON, )  
Plaintiffs, ) CASE NO.  
vs. ) 3:17-CV-06748-WHO  
TESLA, INC. dba TESLA MOTORS, )  
INC.; CITISTAFF SOLUTIONS, )  
INC.; WEST VALLEY STAFFING )  
GROUP; CHARTWELL STAFFING )  
SERVICES, INC.; and DOES 1-50, )  
inclusive, )  
Defendants. )  
- - - - -

DEPOSITION OF MICHAEL JOHN WHEELER

WEDNESDAY, JUNE 12, 2019

Reported by:

BY: MELINDA M. SELLERS, CSR# 10686, RMR, CRC, CRR, CCRR

MICHAEL JOHN WHEELER

June 12, 2019

1     **grave. So. . .**

2           Q.     The text message that you received from  
3     Owen Diaz on November 30, 2018, was there a photo  
4     that was --

5           A.     **Yeah. That was, I want to say, either an**  
6     **email or business card.**

7           Q.     Oh, sorry. I couldn't see it.

8           A.     **I will pull it up.**

9                   **(Viewing cell phone.)**

10                  **(Phone handed to Mr. Adams.)**

11          Q.     So it looks like it's a business card  
12     with -- then there's a photo on the back with a  
13     bunch of 20-dollar bills, hundred-dollar bills?

14          A.     **Oh, yeah. That's my background.**

15          Q.     Oh, that's your background.

16          A.     **Yeah.**

17          Q.     So that wasn't sent to you by Owen Diaz?

18          A.     **No, no. That's my rent money.**

19          Q.     Got you.

20          A.     **Took a picture of it before I gave it to my**  
21     **landlord.**

22          Q.     Okay, great.

23          A.     **Last I'm seeing it.**

24          MR. ADAMS: Okay. Those are all the questions I  
25     have.

MICHAEL JOHN WHEELER

June 12, 2019

1 STATE OF CALIFORNIA )

2 ) ss

3 COUNTY OF CALAVERAS )

4 I hereby certify that the witness in the  
5 foregoing deposition of MICHAEL JOHN WHEELER was by  
6 me duly sworn to testify to the truth, the whole  
7 truth, and nothing but the truth in the  
8 within-entitled cause; that said deposition was taken  
9 at the time and place herein named; that the  
10 deposition is a true record of the witness's  
11 testimony as reported by me, a duly certified  
12 shorthand reporter and a disinterested person, and  
13 was thereafter transcribed into typewriting by  
14 computer.

15 I further certify that I am not interested  
16 in the outcome of the said action, nor connected  
17 with, nor related to any of the parties in said  
18 action, nor to their respective counsel.

19 IN WITNESS WHEREOF, I have hereunto set my  
20 hand this 24th day of June, 2019.

21

22

23

24 \_\_\_\_\_  
MELINDA M. SELLERS, CSR NO. 10686

25 STATE OF CALIFORNIA